

**REMARKS**

It is respectfully submitted that the rejection under 35 USC § 112, second paragraph, can be withdrawn in light of the foregoing clarifying amendments made to the claims. The scope of the claims has not been reduced.

The dependency of claim 6 has been corrected. The rewording of claim 1 makes the difference between claims 1 and 9 more apparent. The typographical error in claims 16 and 19 has been corrected, and those claims have been revised to indicate the ink contains a curable vehicle (see page 7 of the application). Claims 17 and 20 have revised to indicate the acrylate vehicle is curable rather than cured. Although not necessary in light of the changes made, it should be noted for the record that applicant does not agree with the suggestion in the Office Action that a cured material cannot be liquid.

The rejection of claims 1, 5-7, 9-12, 16 and 17 under 35 USC § 102 and of claims 2-4 and 13-15 under 35 USC § 103 over Daimon is respectfully traversed.

Daimon teaches a fiber substrate which has been subjected to a surface treatment such as plasma polymerization and preferably by corona discharge. This reference does not, however, teach a substrate which has a plasma polymer coating containing residual unpolymerized polymerizable functional groups on it. To the extent that Daimon contemplates plasma polymerization, it does not suggest that the same be effected to leave residual unpolymerized groups present nor suggest any reason to do so. Since Daimon does not teach or suggest a substrate containing residual unpolymerized polymerizable functional groups, it cannot teach or suggest forming a reaction product with such groups.

Describing applying a curable coating to a surface (which is all that Daimon may disclose) does not suggest forming a reaction product with that surface. In view of this fundamental deficiency in the reference, it is respectfully submitted that the rejections are untenable and should be withdrawn.

The rejection of claims 1, 5-7, 9, 11-12, 16 and 17 under 35 USC § 102 and of claims 2-4, 10 and 13-15 under 35 USC § 103 over Vargo is respectfully traversed.

Vargo teaches an adhesive-oxyhalopolymer composite in which hydrogen or oxygen groups bond the polymer to the adhesive. The “polymer” can possibly be in the form of a non-halogenated substrate on which a polymerized fluorocarbon coating has been applied (col. 7) and has thereafter been treated to substitute H or O for some of the halogen moieties. The H and O are not residual unpolymerized polymerizable functional groups of a plasma polymer. Vargo also teaches that the O and H can be used to bond the polymer to an adhesive, which can possibly be (but does not have to be) a radiation curable material. While the adhesive may be radiation curable, it does not form a reaction product with residual unpolymerized polymerizable functional groups when radiation is applied, as in the claimed invention. In Vargo, the halopolymer is bonded to the radiation curable adhesive before radiation is applied because once radiation is applied, the adhesive would be cured (set) and could not perform its intended function of bonding to something else. Vargo uses the H or O to bond the polymer to the adhesive without eliminating the adhesive quality of the adhesive so that the polymer can be bonded to the something else via the adhesive.

It will be appreciated from the foregoing that Vargo is fundamentally different from the present invention. The reference does not teach the claimed invention nor suggest that there is any reason to make the drastic changes necessary to convert what Vargo does teach into the claimed invention. Accordingly, withdrawal of these rejections is respectfully requested.

Claims 2-4, and 13-15 were rejected under 35 USC § 103 over Daimon in view of McGee, and claims 8 and 18-20 rejected under 35 USC § 103 over Daimon in view of McGee and either Goodwin, Willlis or Kamel. Both rejections are respectfully traversed.

The applicability of Daimon has been discussed above. None of the McGee, Goodwin, Willlis or Kamel references have been advanced to cure any of the basic deficiencies in Daimon, nor do they do so. Accordingly, these rejections are not tenable and should be withdrawn.

Claims 8 and 18-20 were rejected under 35 USC § 103 over Vargo in view of Goodwin. Since Goodwin has not asserted to cure any of the basic deficiencies in Vargo discussed above, nor does it do so, it is respectfully submitted that this rejection is not tenable and should be withdrawn.

In view of the discussion above, it is not considered necessary to discuss other assertions in the Office Action, and it should not be assumed that applicant agrees with any assertion not discussed.

In view of the above amendments and remarks, applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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